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Dwight Neven, Ronald Oliver,  
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Marilyn Johnson, Heather Dougherty,  
Tammy Otero and Rene Pena*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

ERIN KUHN-BROWN,

Plaintiff,

v.

DWIGHT NEVEN, *et al.*,

Defendants.

Case No. 2:19-cv-01140-RFB-VCF

**STIPULATION FOR EXTENSION OF  
TIME TO FILE DISCOVERY  
PLAN/SCHEDULING ORDER  
(Second Request)**

Plaintiff, Erin Kuhn-Brown, by and through counsel, Lawrence Semenza, and Defendants Dwight Neven, Ronald Oliver, Gabriella Najera fka Gabriella Garcia, Marilyn Johnson, Heather Dougherty, Tammy Otero and Rene Pena, by and through counsel, Aaron D. Ford, Nevada Attorney General, and Andrew C. Nelson, Deputy Attorney General, of the State of Nevada, Office of the Attorney General, hereby stipulate to extend the deadline to file the Discovery Plan/Scheduling Order to October 21, 2022. The Court, in ECF No. 35, ordered the Discovery Plan/Scheduling be filed by September 30, 2022.

Counsel for the Defendants has recently been assigned to the instant matter. Additionally, Plaintiff's Counsel has had difficulty obtaining Plaintiff's pleadings and papers from the institution. This is being solved between the parties. Therefore, Counsel for Plaintiff and Defendants has not been able to complete the Discovery Plan/Scheduling Order in this matter.

Counsel for the parties corresponded with each other on October 19, 2022, and there has been difficulty obtaining Plaintiff's documents from the institution. Accordingly, the Parties hereby stipulate to extend the deadline to file the Discovery Plan/Scheduling Order from October 21, 2022, to **November 18, 2022**. The Parties respectfully request the Court grant the request, and extend the deadline.

DATED this 19th day of October, 2022

DATED this 19th day of October, 2022

LAWRENCE J. SEMENZA, ESQ.  
LAWRENCE J. SEMENZA, LTD.

AARON D. FORD  
Attorney General

By: /s/Lawrence J. Semenza  
LAWRENCE J. SEMENZA, Bar #789  
*Attorney for Plaintiff*

By: /s/ Andrew C. Nelson  
ANDREW C. NELSON, Bar #15971  
Deputy Attorney General  
*Attorneys for Defendants*

### ORDER

This Court having considered the parties stipulation and good cause appearing therefore, **IT IS HEREBY ORDERED** that the parties' stipulation to extend the deadline to file the Discovery Plan/Scheduling Order from October 21, 2022, to November 18, 2022 is hereby granted.

IT IS SO ORDERED.



Cam Ferenbach  
United States Magistrate Judge  
10-19-2022

DATED \_\_\_\_\_